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December 14, 2010

MUR # 6443

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

SENSITIVE

Dear Mr. Hughey:

Enclosed please find a copy of a complaint submitted initially on November 29, 2010, now subscribed and sworn before a notary public. Thank you for your attention to this matter.

Very truly yours,



Brian G. Svoboda
General Counsel
Democratic Congressional Campaign Committee

Enclosure

04031-0001/LEGAL1966687.1

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Perkins Coie LLP and Affiliates

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November 29, 2010

Christopher Hughey, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Dear Mr. Hughey:

The Democratic Congressional Campaign Committee, by and through its general counsel, files this complaint under 2 U.S.C. § 437g against Americans for Common Sense Solutions ("ACSS"). Available Commission records indicate that, in stark violation of law, ACSS has repeatedly distributed television and radio advertisements attacking Congressional candidate David Cicilline before his voters on the eve of the election, while making no disclosures whatsoever to the Commission.

The Bipartisan Campaign Reform Act of 2002 requires sponsors of "electioneering communications" - e.g., broadcast, cable or satellite communications that refer to federal candidates before their own voters in the 60 days before the general election - to file public reports with the Commission. See 2 U.S.C. § 434(f). This was so that voters and the affected candidates could have detailed information about the communications and their sponsors, who might otherwise seek to avoid public scrutiny.

The Supreme Court of the United States has consistently upheld these requirements, most recently in *Citizens United v. FEC*, 130 S. Ct. 876 (2010). The Court overwhelmingly found that they were consistent with the First Amendment, providing the transparency needed for voters to make informed decisions at the polls and give proper weight to sponsor views.

The DCCC has obtained copies of television and radio advertisements sponsored by ACSS and attacking Cicilline in his Congressional district inside the 60-day window. See Exhibit. But Commission records available on the World Wide Web at this writing show no filings whatsoever made by ACSS. One cannot know the reason for this nondisclosure. But its effect is clear: it deprives voters of information about false advertisements that are plainly contrived to damage Mr. Cicilline's reputation on the eve of his election to Congress.

04031-0001/LEGAL19666687.1

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12044314192

Christopher Hughey, Esq.

Page 2

The Commission should take immediate action to investigate and punish these clear violations. Having both the authority and the cause, it should seek civil penalties, and obtain an injunction against future nondisclosure.

Very truly yours,



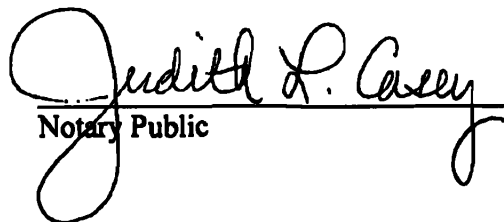
Brian G. Svoboda

General Counsel

Democratic Congressional Campaign Committee

Enclosure

SUBSCRIBED AND SWORN to before me this 14th day of December, 2010.


Notary Public

My Commission Expires:

December 14, 2014

JUDITH LEIGH CASEY
Notary Public, District of Columbia
My Commission Expires December 14, 2014